

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

**In re:**

**NOBILIS HEALTH CORP., *et al.*,**

**Debtors.**

**ALFRED T. GIULIANO, in his capacity as  
Chapter 7 Trustee for the jointly  
administered bankruptcy estates of Nobilis  
Health Corp., *et al.*,**

**Plaintiff,**

**v.**

**HARRY J. FLEMING; P. DAVID  
YOUNG; BRANDON MORENO;  
KENNETH EFIRD; JAMES  
SPRINGFIELD; DONALD KRAMER;  
STEVE OZONIAN; TOM FOSTER;  
PETER HORAN; SAMUEL PALERMO;  
AND MARCOS RODRIGUEZ**

**Defendants.**

**Chapter 7**

**Case No. 19-12264 (CTG)  
(Jointly Administered)**

**Adv. No. 21-51183 (CTG)**

**JURY TRIAL DEMANDED**

**CERTIFICATION OF COUNSEL  
REGARDING SCHEDULING ORDER**

I, John T. Carroll, III, counsel for Plaintiff, Alfred T. Giuliano, in his capacity as Chapter 7 Trustee (the “Trustee” or “Plaintiff”) for the jointly administered bankruptcy estates of Northstar Healthcare Holdings, Inc., Northstar Healthcare Acquisitions, L.L.C. and Nobilis Health Corp. (the “Estates” or “Debtors”) hereby certify that the Trustee and the Defendants in the above-captioned adversary proceeding as identified below (the “Adversary Proceeding”) have agreed subject to this Court’s approval to a scheduling order for the disposition of the Adversary Proceeding and hereby certify as follows:

1. The Trustee along with Harry J. Fleming; P. David Young; Brandon Moreno; Kenneth Efird; James Springfield; Donald Kramer; Steve Ozonian; Tom Foster; Peter Horan; Samuel Palermo; and Marcos Rodriguez (the “Defendants” and, collectively with the Trustee, the “Parties”), request entry of an order pursuant to rule 7016 of the Federal Rules of Bankruptcy Procedure to enter a scheduling order in the above-captioned matter.

Accordingly, the Trustee and Defendants respectfully request if acceptable to the Court that the Court enter an Order in the proposed form attached hereto as Exhibit “A” at the Court’s earliest convenience.

Dated: August 30, 2022

**COZEN O’CONNOR**

/s/ John T. Carroll, III  
John T. Carroll, III (DE Bar No. 4060)  
1201 North Market Street  
Suite 1001  
Wilmington, DE 19801  
Tel: (302) 295-2028  
Fax: (302) 295-2013  
[jcarroll@cozen.com](mailto:jcarroll@cozen.com)

-and-

**KAUFMAN, COREN & RESS, P.C.**  
Steven M. Coren, Esq.  
Benjamin M. Mather, Esq.  
Andrew J. Belli, Esq.  
Two Commerce Square  
2001 Market Street, Suite 3900  
Philadelphia, PA 19103  
Tel: (215) 735-8700  
Fax: (215) 735-5170  
[scoren@kcr-law.com](mailto:scoren@kcr-law.com)  
[bmather@kcr-law.com](mailto:bmather@kcr-law.com)  
[abelli@kcr-law.com](mailto:abelli@kcr-law.com)

*Counsel for Plaintiff*  
*Alfred T. Giuliano, Ch. 7 Trustee*